

EXHIBIT 2

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10 SAMSUNG SDI CO., LTD.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 In Re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944-SC

MDL No. 1917

18 This Document Relates to:

19 DELL INC. and DELL PRODUCTS L.P.,
20 Plaintiffs,
21 v.
22 HITACHI, LTD., et al.,
23 Defendants.
24

Individual Case No. 3:13-cv-02171-SC

**SAMSUNG SDI CO., LTD.'S
RESPONSES TO DELL PLAINTIFFS'
FIRST SET OF REQUESTS FOR
ADMISSION**

25 PROPOUNDING PARTIES: DELL INC. and DELL PRODUCTS L.P.

26 RESPONDING PARTY: SAMSUNG SDI CO., LTD.

27 SET NUMBER: One (1)
28

1 to this request on the grounds that it is duplicative and unreasonably cumulative of other
2 discovery propounded and responded to in this multi-district litigation, in violation of
3 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
4 Management Protocol, and is therefore unduly burdensome and oppressive.

5 **REQUEST FOR ADMISSION NO. 22:**

6 Admit that officers and employees of Samsung SDI participated in a
7 conspiracy to fix prices of CDTs with at least one of the Irico Companies during the
8 Relevant Period.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

10 In addition to its General Objections and Objections to Certain Instructions
11 and Definitions, each of which is incorporated by this reference as though fully set forth
12 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
13 without limitation as to the term "participated in a conspiracy" as used in this request. SDI
14 also objects to this request to the extent it seeks information in the possession, custody or
15 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
16 defendants, third parties or otherwise. SDI further objects to this request to the extent it
17 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
18 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
19 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
20 information that is neither relevant to any claims or defenses in this litigation nor
21 reasonably calculated to lead to the discovery of admissible evidence.

22 Subject to and without waiver of the foregoing objections, and based on
23 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
24 SDI responds as follows: Denied.

25 **REQUEST FOR ADMISSION NO. 23:**

26 Admit that officers and employees of Samsung SDI participated in a
27 conspiracy to reduce output of CDTs with at least one of the Irico Companies during the
28 Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 23:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the term “participated in a conspiracy” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: Denied.

REQUEST FOR ADMISSION NO. 24:

Admit that officers and employees of Samsung SDI participated in a conspiracy to allocate market shares of CDTs with at least one of the Irico Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the term “participated in a conspiracy” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it

1 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
2 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
3 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
4 information that is neither relevant to any claims or defenses in this litigation nor
5 reasonably calculated to lead to the discovery of admissible evidence.

6 Subject to and without waiver of the foregoing objections, and based on
7 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
8 SDI responds as follows: Denied.

9 **REQUEST FOR ADMISSION NO. 25:**

10 Admit that during discussions and meetings with at least one of the Irico
11 Companies, officers and employees of Samsung SDI reached agreements to fix prices of
12 CDTs during the Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the purportedly defined term "discussions and meetings" and the
18 term "agreements" as used in this request. SDI also objects to this request to the extent it
19 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
20 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
21 further objects to this request to the extent it assumes disputed facts or legal conclusions,
22 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
23 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
24 grounds that it is overbroad and seeks information that is neither relevant to any claims or
25 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
26 evidence.

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: Denied.

4 **REQUEST FOR ADMISSION NO. 26:**

5 Admit that during discussions and meetings with at least one of the Irico
6 Companies, officers and employees of Samsung SDI reached agreements to reduce output
7 of CDTs during the Relevant Period.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

9 In addition to its General Objections and Objections to Certain Instructions
10 and Definitions, each of which is incorporated by this reference as though fully set forth
11 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
12 without limitation as to the purportedly defined term "discussions and meetings" and the
13 term "agreements" as used in this request. SDI also objects to this request to the extent it
14 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
15 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
16 further objects to this request to the extent it assumes disputed facts or legal conclusions,
17 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
18 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
19 grounds that it is overbroad and seeks information that is neither relevant to any claims or
20 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Subject to and without waiver of the foregoing objections, and based on
23 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
24 SDI responds as follows: Denied.

25 **REQUEST FOR ADMISSION NO. 27:**

26 Admit that during discussions and meetings with at least one of the Irico
27 Companies, officers and employees of Samsung SDI reached agreements to allocate
28 market shares of CDTs during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 27:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the purportedly defined term “discussions and meetings” and the term “agreements” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: Denied.

REQUEST FOR ADMISSION NO. 28:

Admit that officers and employees of Samsung SDI engaged in discussions and attended meetings with representatives of at least one of the LG Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 28:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the purportedly defined term “discussions and [] meetings” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to

RESPONSE TO REQUEST FOR ADMISSION NO. 35:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request on the grounds that it is vague and ambiguous, including without limitation as to the purportedly defined term “discussions and meetings” and the term “agreements” as used in this request. SDI also objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: Denied.

REQUEST FOR ADMISSION NO. 36:

Admit that officers and employees of Samsung SDI engaged in discussions and attended meetings with at least one of the Mitsubishi Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 36:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to

1 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
2 legal conclusions. SDI also objects to this request on the grounds that it is vague and
3 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
4 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Subject to and without waiver of the foregoing objections, and based on
7 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
8 SDI responds as follows: SDI admits that it engaged in discussions and attended meetings
9 as described in its Plea Agreement with individuals who SDI understood to be
10 representatives of at least one Mitsubishi entity.

11 **REQUEST FOR ADMISSION NO. 37:**

12 Admit that officers and employees of Samsung SDI exchanged CDT pricing
13 information with at least one of the Mitsubishi Companies during the Relevant Period.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

15 In addition to its General Objections and Objections to Certain Instructions
16 and Definitions, each of which is incorporated by this reference as though fully set forth
17 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
18 without limitation as to the term "pricing information" as used in this request. SDI also
19 objects to this request to the extent it seeks information in the possession, custody or
20 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
21 defendants, third parties or otherwise. SDI further objects to this request to the extent it
22 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
23 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
24 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
25 information that is neither relevant to any claims or defenses in this litigation nor
26 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
27 to this request on the grounds that it is duplicative and unreasonably cumulative of other
28 discovery propounded and responded to in this multi-district litigation, in violation of

1 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
2 Management Protocol, and is therefore unduly burdensome and oppressive.

3 **REQUEST FOR ADMISSION NO. 38:**

4 Admit that officers and employees of Samsung SDI participated in a
5 conspiracy to fix prices of CDTs with at least one of the Mitsubishi Companies during the
6 Relevant Period.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

8 In addition to its General Objections and Objections to Certain Instructions
9 and Definitions, each of which is incorporated by this reference as though fully set forth
10 herein, SDI objects to this request to the extent it seeks information in the possession,
11 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
12 from other defendants, third parties or otherwise. SDI further objects to this request to the
13 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
14 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
15 legal conclusions. SDI also objects to this request on the grounds that it is vague and
16 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
17 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Subject to and without waiver of the foregoing objections, and based on
20 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
21 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
22 in its Plea Agreement with at least one Mitsubishi entity.

23 **REQUEST FOR ADMISSION NO. 39:**

24 Admit that officers and employees of Samsung SDI participated in a
25 conspiracy to reduce output of CDTs with at least one of the Mitsubishi Companies during
26 the Relevant Period.

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RESPONSE TO REQUEST FOR ADMISSION NO. 39:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is vague and ambiguous, overbroad, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI's present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: SDI admits that it participated in the CDT conspiracy described in its Plea Agreement with at least one Mitsubishi entity.

REQUEST FOR ADMISSION NO. 40:

Admit that officers and employees of Samsung SDI participated in a conspiracy to allocate market shares of CDTs with at least one of the Mitsubishi Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 40:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or

1 legal conclusions. SDI also objects to this request on the grounds that it is vague and
2 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
3 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Subject to and without waiver of the foregoing objections, and based on
6 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
7 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
8 in its Plea Agreement with at least one Mitsubishi entity.

9 **REQUEST FOR ADMISSION NO. 41:**

10 Admit that during discussions and meetings with at least one of the
11 Mitsubishi Companies, officers and employees of Samsung SDI reached agreements to fix
12 prices of CDTs during the Relevant Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request to the extent it seeks information in the possession,
17 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
18 from other defendants, third parties or otherwise. SDI further objects to this request to the
19 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
20 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
21 legal conclusions. SDI also objects to this request on the grounds that it is vague and
22 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
23 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
24 evidence.

25 Subject to and without waiver of the foregoing objections, and based on
26 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
27 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
28 in its Plea Agreement with at least one Mitsubishi entity.

1 **REQUEST FOR ADMISSION NO. 42:**

2 Admit that during discussions and meetings with at least one of the
3 Mitsubishi Companies, officers and employees of Samsung SDI reached agreements to
4 reduce output of CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request to the extent it seeks information in the possession,
9 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
10 from other defendants, third parties or otherwise. SDI further objects to this request to the
11 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
12 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
13 legal conclusions. SDI also objects to this request on the grounds that it is vague and
14 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
15 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Subject to and without waiver of the foregoing objections, and based on
18 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
19 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
20 in its Plea Agreement with at least one Mitsubishi entity.

21 **REQUEST FOR ADMISSION NO. 43:**

22 Admit that during discussions and meetings with at least one of the
23 Mitsubishi Companies, officers and employees of Samsung SDI reached agreements to
24 allocate market shares of CDTs during the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request to the extent it seeks information in the possession,

1 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
2 from other defendants, third parties or otherwise. SDI further objects to this request to the
3 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
4 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
5 legal conclusions. SDI also objects to this request on the grounds that it is vague and
6 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
7 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Subject to and without waiver of the foregoing objections, and based on
10 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
11 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
12 in its Plea Agreement with at least one Mitsubishi entity.

13 **REQUEST FOR ADMISSION NO. 44:**

14 Admit that officers and employees of Samsung SDI engaged in discussions
15 and attended meetings with at least one of the Philips Companies during the Relevant
16 Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
21 without limitation as to the purportedly defined term "discussions and [] meetings" as used
22 in this request. SDI also objects to this request to the extent it seeks information in the
23 possession, custody or control of Plaintiffs, or that are equally or more readily available to
24 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
25 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
26 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
27 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
28

1 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
2 without limitation as to the purportedly defined term “discussions and meetings” and the
3 term “agreements” as used in this request. SDI also objects to this request to the extent it
4 seeks information in the possession, custody or control of Plaintiffs, or that are equally or
5 more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI
6 further objects to this request to the extent it assumes disputed facts or legal conclusions,
7 and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby
8 denies any such disputed facts or legal conclusions. SDI also objects to this request on the
9 grounds that it is overbroad and seeks information that is neither relevant to any claims or
10 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Subject to and without waiver of the foregoing objections, and based on
13 SDI’s present knowledge following a reasonable and non-exhaustive search and inquiry,
14 SDI responds as follows: Denied.

15 **REQUEST FOR ADMISSION NO. 68:**

16 Admit that officers and employees of Samsung SDI engaged in discussions
17 and attended meetings with at least one of the Chunghwa Companies during the Relevant
18 Period.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 68:**

20 In addition to its General Objections and Objections to Certain Instructions
21 and Definitions, each of which is incorporated by this reference as though fully set forth
22 herein, SDI objects to this request to the extent it seeks information in the possession,
23 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
24 from other defendants, third parties or otherwise. SDI further objects to this request to the
25 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
26 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
27 legal conclusions. SDI also objects to this request on the grounds that it is vague and
28 ambiguous, overbroad, and seeks information that is neither relevant to any claims or

1 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Subject to and without waiver of the foregoing objections, and based on
4 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
5 SDI responds as follows: SDI admits that it engaged in discussions and attended meetings
6 as described in its Plea Agreement with individuals who SDI understood to be
7 representatives of at least one Chunghwa entity.

8 **REQUEST FOR ADMISSION NO. 69:**

9 Admit that officers and employees of Samsung SDI exchanged CDT pricing
10 information with at least one of the Chunghwa Companies during the Relevant Period.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 69:**

12 In addition to its General Objections and Objections to Certain Instructions
13 and Definitions, each of which is incorporated by this reference as though fully set forth
14 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
15 without limitation as to the term "pricing information" as used in this request. SDI also
16 objects to this request to the extent it seeks information in the possession, custody or
17 control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other
18 defendants, third parties or otherwise. SDI further objects to this request to the extent it
19 assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI
20 to draw legal conclusions, and SDI hereby denies any such disputed facts or legal
21 conclusions. SDI also objects to this request on the grounds that it is overbroad and seeks
22 information that is neither relevant to any claims or defenses in this litigation nor
23 reasonably calculated to lead to the discovery of admissible evidence. SDI further objects
24 to this request on the grounds that it is duplicative and unreasonably cumulative of other
25 discovery propounded and responded to in this multi-district litigation, in violation of
26 Section X.V., par. C-F, of the Court's April 3, 2012 Order re Discovery and Case
27 Management Protocol, and is therefore unduly burdensome and oppressive.

28

1 **REQUEST FOR ADMISSION NO. 70:**

2 Admit that during discussions and meetings with at least one of the
3 Chunghwa Companies, officers and employees of Samsung SDI reached agreements to fix
4 prices of CDTs during the Relevant Period.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 70:**

6 In addition to its General Objections and Objections to Certain Instructions
7 and Definitions, each of which is incorporated by this reference as though fully set forth
8 herein, SDI objects to this request to the extent it seeks information in the possession,
9 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
10 from other defendants, third parties or otherwise. SDI further objects to this request to the
11 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
12 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
13 legal conclusions. SDI also objects to this request on the grounds that it is vague and
14 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
15 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Subject to and without waiver of the foregoing objections, and based on
18 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
19 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
20 in its Plea Agreement with at least one Chunghwa entity.

21 **REQUEST FOR ADMISSION NO. 71:**

22 Admit that during discussions and meetings with at least one of the
23 Chunghwa Companies, officers and employees of Samsung SDI reached agreements to
24 reduce output of CDTs during the Relevant Period.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 71:**

26 In addition to its General Objections and Objections to Certain Instructions
27 and Definitions, each of which is incorporated by this reference as though fully set forth
28 herein, SDI objects to this request to the extent it seeks information in the possession,

1 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
2 from other defendants, third parties or otherwise. SDI further objects to this request to the
3 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
4 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
5 legal conclusions. SDI also objects to this request on the grounds that it is vague and
6 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
7 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Subject to and without waiver of the foregoing objections, and based on
10 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
11 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
12 in its Plea Agreement with at least one Chunghwa entity.

13 **REQUEST FOR ADMISSION NO. 72:**

14 Admit that during discussions and meetings with at least one of the
15 Chunghwa Companies, officers and employees of Samsung SDI reached agreements to
16 allocate market shares of CDTs during the Relevant Period.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 72:**

18 In addition to its General Objections and Objections to Certain Instructions
19 and Definitions, each of which is incorporated by this reference as though fully set forth
20 herein, SDI objects to this request to the extent it seeks information in the possession,
21 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
22 from other defendants, third parties or otherwise. SDI further objects to this request to the
23 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
24 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
25 legal conclusions. SDI also objects to this request on the grounds that it is vague and
26 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
27 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
28 evidence.

1 Subject to and without waiver of the foregoing objections, and based on
2 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
3 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
4 in its Plea Agreement with at least one Chunghwa entity.

5 **REQUEST FOR ADMISSION NO. 73:**

6 Admit that officers and employees of Samsung SDI participated in a
7 conspiracy to fix prices of CDTs with at least one of the Chunghwa Companies during the
8 Relevant Period.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 73:**

10 In addition to its General Objections and Objections to Certain Instructions
11 and Definitions, each of which is incorporated by this reference as though fully set forth
12 herein, SDI objects to this request to the extent it seeks information in the possession,
13 custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs
14 from other defendants, third parties or otherwise. SDI further objects to this request to the
15 extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to
16 require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or
17 legal conclusions. SDI also objects to this request on the grounds that it is vague and
18 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
19 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Subject to and without waiver of the foregoing objections, and based on
22 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
23 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
24 in its Plea Agreement with at least one Chunghwa entity.

25 **REQUEST FOR ADMISSION NO. 74:**

26 Admit that officers and employees of Samsung SDI participated in a
27 conspiracy to reduce output of CDTs with at least one of the Chunghwa Companies during
28 the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 74:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or legal conclusions. SDI also objects to this request on the grounds that it is vague and ambiguous, overbroad, and seeks information that is neither relevant to any claims or defenses in this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of the foregoing objections, and based on SDI's present knowledge following a reasonable and non-exhaustive search and inquiry, SDI responds as follows: SDI admits that it participated in the CDT conspiracy described in its Plea Agreement with at least one Chunghwa entity.

REQUEST FOR ADMISSION NO. 75:

Admit that officers and employees of Samsung SDI participated in a conspiracy to allocate market shares of CDTs with at least one of the Chunghwa Companies during the Relevant Period.

RESPONSE TO REQUEST FOR ADMISSION NO. 75:

In addition to its General Objections and Objections to Certain Instructions and Definitions, each of which is incorporated by this reference as though fully set forth herein, SDI objects to this request to the extent it seeks information in the possession, custody or control of Plaintiffs, or that are equally or more readily available to Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it purports to require SDI to draw legal conclusions, and SDI hereby denies any such disputed facts or

1 legal conclusions. SDI also objects to this request on the grounds that it is vague and
2 ambiguous, overbroad, and seeks information that is neither relevant to any claims or
3 defenses in this litigation nor reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Subject to and without waiver of the foregoing objections, and based on
6 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
7 SDI responds as follows: SDI admits that it participated in the CDT conspiracy described
8 in its Plea Agreement with at least one Chunghwa entity.

9 **REQUEST FOR ADMISSION NO. 76:**

10 Admit that officers and employees of Samsung SDI engaged in discussions
11 and attended meetings with at least one of the Orion Companies during the Relevant
12 Period.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 76:**

14 In addition to its General Objections and Objections to Certain Instructions
15 and Definitions, each of which is incorporated by this reference as though fully set forth
16 herein, SDI objects to this request on the grounds that it is vague and ambiguous, including
17 without limitation as to the purportedly defined term "discussions and [] meetings" as used
18 in this request. SDI also objects to this request to the extent it seeks information in the
19 possession, custody or control of Plaintiffs, or that are equally or more readily available to
20 Plaintiffs from other defendants, third parties or otherwise. SDI further objects to this
21 request to the extent it assumes disputed facts or legal conclusions, and/or to the extent it
22 purports to require SDI to draw legal conclusions, and SDI hereby denies any such
23 disputed facts or legal conclusions. SDI also objects to this request on the grounds that it
24 is overbroad and seeks information that is neither relevant to any claims or defenses in this
25 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Subject to and without waiver of the foregoing objections, and based on
27 SDI's present knowledge following a reasonable and non-exhaustive search and inquiry,
28 SDI responds as follows: Denied.